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► **Ex Parte VIA ECFS**

December 12, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St SW
Washington DC 20554

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RE: GN Docket No. 13-5 Technology Transitions Task Force
GN Docket No. 12-353 Comment Sought on the Technological
Transition of the Nations Communications infrastructure

Dear Ms. Dortch:

On Wednesday, December 11, I spoke by phone with Robert Cannon of the Office of Strategic Plans and Policy Analysis and with Dr Henning Schulzrinne Chief Technology Officer of the Commission on the above proceedings specifically as it relates to issues involving the North American Numbering Plan and US national numbering databases. In particular I reviewed my previous comments of 7/19/2013 to the Commission on Numbering.¹

In particular I restated my position that Numbering Policy is central to the overall goal of the PSTN Transition and there were several actionable items the Commission could undertake to clarify policy in this area. In particular I noted that with 12% of the US Population moving each year and the end of LATA's as a result of the ICC/USF reform there is no reason we cannot move to a system of National Geographic Number Portability. In addition I believe National 10 Digit dialing is a precondition for that requirement.

The Commission needs to tighten up the delegation and reassignment policies for the NANP in order to insure proper traceability of the resource in order to combat spoofing and fraud. This is particularly acute in the toll free 800 name space.

¹ <http://apps.fcc.gov/ecfs/document/view?id=7520931878>

I also stated I believe the Industry now understands that existing numbering databases [LERG] [NPAC] [LIDB] will be need to be restructured in the intermediate term in order to facilitate the Transition. The existing SIP interconnection practice of exchanging Microsoft Excel files with Local Routing Number ranges and Operating Company Number will not scale if the Transition is to be successful.

I am personally involved in an industry wide initiative on a technical outline or “profile” on how all a national system of SIP Interconnection would work “on the wire” and this would include a definition of how the existing Numbering Databases could be used. There will be some announcements on this shortly. This effort would not preclude the industry coming to consensus on future numbering database technology or protocols, but given the “time to market” requirements of the Transition, the use of existing databases and proven technologies such as Private ENUM based on IETF RFC 6116 seems the most prudent course of action.

I’m available to answer any questions about these comments as needed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rich Shockey', is positioned above a solid red horizontal line.

Richard Shockey
Principal
Shockey Consulting

[CC via email](#)

Robert Cannon

Dr Henning Schulzrinne